

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

HEADWATER RESEARCH LLC,

Plaintiff,

v.

CELLCO PARTNERSHIP D/B/A VERIZON
WIRELESS AND VERIZON CORPORATE
SERVICES GROUP INC.,

Defendants.

Case No. 2:23-cv-00352-JRG-RSP

JURY TRIAL DEMANDED

**PLAINTIFF HEADWATER RESEARCH LLC'S OPPOSITION TO DEFENDANTS'
MOTION FOR LEAVE TO FILE SIXTH OPPOSED MOTION *IN LIMINE***

Headwater respectfully opposes Defendants' motion for leave to file a sixth motion *in limine* because it circumvents this Court's limitation on MILs without proper justification. While Defendants assert that Headwater should have simply agreed to this MIL because it was previously entered, Defendants neglect to mention that they refused to agree to Headwater's MIL #1, which likewise seeks to impose MIL orders previously granted in other Headwater cases. In other words, both sides asked each other to agree to certain previously entered MILs. The difference is that, when Defendants refused, Headwater fit its request into the Court's 5 MIL / 15-page briefing limits, whereas Defendants did not and instead moved for leave to submit a sixth MIL using an additional two pages. Rather than burden the Court with its own motion for leave and more pages of briefing, Headwater narrowed its MIL requests to stay within the limits. Headwater respectfully submits that Defendants should not be rewarded for doing otherwise.

To the extent Defendants are granted leave, Headwater submits that its two clarifications should be included if the Court is inclined to grant Defendants' MIL, for the reasons set forth in Headwater's accompanying [proposed] opposition.

Dated: May 8, 2025

Respectfully submitted,

/s/ Reza Mirzaie

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CERTIFICATE OF SERVICE

I hereby certify that on May 8, 2025, I electronically filed the foregoing document with the Clerk of the Court for the Eastern District of Texas using the ECF System, and served defendants with a copy via electronic mail.

/s/ Reza Mirzaie
Reza Mirzaie